

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JILL FIRSE,

Plaintiff,

v.

**LVNV FUNDING, LLC AND
NORTHLAND GROUP, INC.,**

Defendants.

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CIVIL ACTION NO. 3:10-CV-00995-B

DEFENDANT LVNV FUNDING, LLC'S ANSWER

Comes now, Defendant, LVNV Funding, LLC ("Defendant"), and files its Answer to Plaintiff's Original Complaint and shows the Court as follows in response to the Complaint and by way of defense:

I.

NATURE OF THE ACTION AND JURISDICTION

1. The first two sentences of Paragraph 1 of Plaintiff's Complaint contain legal conclusions that Defendant is neither required to admit or deny. Defendant admits that this Court has jurisdiction and venue is appropriate in this Court.

2. Defendant is without information or knowledge sufficient to form a belief as to the truth of the averments contained in paragraph 2 of Plaintiff's Complaint and therefore denies the same.

3. Defendant denies the averments contained in Paragraph 3 of Plaintiff's Complaint as to LVNV. Defendant admits the averments as to Northland Group, Inc.

4. Defendant denies the averments contained in Paragraph 4 of Plaintiff's Complaint as to LVNV. Defendant admits the averments as to Northland Group, Inc.

FIRST COUNT

5. Defendant denies that it contacted Plaintiff. Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining averments contained in Paragraph 5 of Plaintiff's Complaint and therefore denies the same.

6. Defendant denies the averments contained in Paragraph 6 of Plaintiff's Complaint.

SECOND COUNT
VIOLATION OF THE TEXAS DEBT COLLECTION PRACTICES ACT

7. Paragraph 7 of Plaintiff's Complaint contains matters that Defendant is not required to admit or deny.

8. Defendant denies the averments contained in Paragraph 8 of Plaintiff's Complaint.

9. Defendant denies the averments contained in Paragraph 9 of Plaintiff's Complaint.

10. Defendant denies the averments contained in Paragraph 10 of Plaintiff's Complaint.

11. Defendant denies the averments contained in Paragraph 11 of Plaintiff's Complaint.

THIRD COUNT
VIOLATION OF THE TEXAS DECEPTIVE TRADE PRACTICES ACT

12. Paragraph 12 of Plaintiff's Complaint contains matters that Defendant is not required to admit or deny.

13. Paragraph 13 of Plaintiff's Complaint contains legal conclusions that Defendant is neither required to admit or deny.

14. Defendant denies the averments contained in Paragraph 14 of Plaintiff's Complaint.

15. Defendant denies the averments contained in Paragraph 15 of Plaintiff's Complaint.

16. Defendant denies the averments contained in Paragraph 16 of Plaintiff's Complaint.

17. Defendant denies the averments contained in Paragraph 17 of Plaintiff's Complaint.

18. Defendant denies the averments contained in Paragraph 18 of Plaintiff's Complaint.

19. Defendant denies the averments contained in Paragraph 19 of Plaintiff's Complaint.

20. Paragraph 20 of Plaintiff's Complaint contains legal conclusions that Defendant is neither required to admit or deny.

21. Paragraph 21 of Plaintiff's Complaint contains legal conclusions that Defendant is neither required to admit or deny.

WHEREFORE, Defendant LVNV prays for an order and judgment of this Court against Plaintiff dismissing all claims against it, awarding Defendant its costs, and for such other and further relief to which Defendant is justly entitled.

Respectfully submitted,

/s/ Michael L. Jones

Michael L. Jones

State Bar No. 10929460

Elizabeth R. Caldeleugh

State Bar No. 00787184

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**ATTORNEYS FOR DEFENDANT
LVNV FUNDING, LLC**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of Defendant LVNV Funding, LLC's Original Answer was forwarded by telecopy, to Dennis R. Kurz, Weisberg & Meyers, L.L.C., 5025 N. Central Ave., #602, Phoenix, AZ 85012, on this the 28th day of June, 2010.

/s/ Michael L. Jones

Michael L. Jones

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